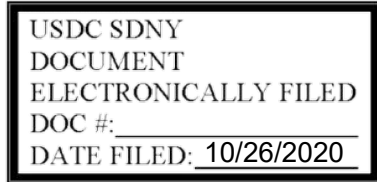


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October 26, 2020

VIA ECF AND ELECTRONIC MAIL

The Honorable John P. Cronan, U.S.D.J.

United States District Court

Southern District of New York

500 Pearl Street

Courtroom 20C

New York, New York 10007

CronanNYSDChambers@nysd.uscourts.gov

Re: *Vuppala v. Tapestry Management LLC, et al.*, Civil Action No.: 1:19-cv-04246-JPC-RWL

Defendants' Letter Request for Adjournment/Stay

Dear Judge Cronan:

As of one week ago, our law offices were retained as substitute counsel by all named defendants¹ in connection with the above-referenced action presently pending before the Court and recently reassigned to Your Honor on or about October 7, 2020, pursuant to that certain Notice of Reassignment entered by the Court on even date thereof. *See* ECF No. 50. In accordance with Rules 1(A) and 3(B) of Your Honor's Individual Rules and Practices in Civil Cases (the "Individual Rules"), the undersigned hereby submits the instant letter request for a reasonable adjournment or, in the alternative, a stay of all pending deadlines, proceedings, and/or appearances, including, but not limited to, the presently pending mediation scheduled to take place between the parties, in the instant action by sixty (60) days on the grounds that such additional time is necessary to afford incoming counsel sufficient time with which to review relevant documents, prior

¹ The following constitutes an exhaustive list of the defendants named in plaintiff, Kiran Vuppala's ("Plaintiff") Second Amended Complaint filed on August 17, 2020 (the "SAC"): Tapestry Management LLC d/b/a Rahi Indian Restaurant-Greenwich Village NY, Vandelay 60 Greenwich LLC, Paige Properties, LLC, Oyster Bay 777 LLC, RG 60 Greenwich LLC, D 60 Greenwich LLC (collectively, the "Hospitality Defendants"), and Biscuit Entertainment Co., Ltd. (the "Property Owner Defendant", and, together with the Hospitality Defendants, the "Defendants").

proceedings, applications, and what, if any, discovery requests may have been previously propounded, confer with our clients, and otherwise familiarize ourselves with the matter and its current posture. Indeed, it was not until the middle of last week, on or about October 21, 2020, that our law offices received a Dropbox link from outgoing counsel by which to access its litigation file, the thorough review of which is, naturally, a mandatory prerequisite to the taking of any further action herein.

Please be advised, no previous requests for adjournments of whatever nature have been interposed by our law offices in this matter. Regrettably, the undersigned's request that opposing counsel consent to the herein reasonable adjournment request was not only swiftly rebuffed, but further accompanied by the stern admonition that he intended to appear at the parties' mediation scheduled for October 24, 2020—and this, despite having been advised of both the impracticality of so proceeding, given our law offices' retention mere days prior, and the fact that any such appearance by Defendants would be an impossibility in light of the undersigned's having to appear and depose an adverse witness in another of his matters throughout the entirety of that same day.

Good cause therefor having been shown, it is respectfully requested that Your Honor forthwith enter an Order granting Defendants' herein request for a sixty (60) day adjournment/stay of all pending deadlines, proceedings, and/or appearances in the instant action so as to afford our law offices sufficient time with which to adequately prepare for and determine the next steps to be taken herein. Additional information germane to the instant request can be found in the status letter penned and filed by outgoing counsel on or about October 21, 2020, to which Your Honor is respectfully referred. *See* ECF No. 52.

On behalf of Defendants, we thank the Court for its time and attention to these matters. Of course, should the Court wish to discuss these, or any other, matters at greater length, please do not hesitate to contact the undersigned at (212) 221-8763, or, alternatively, at pwaran@graelaw.com.

Respectfully submitted,



Previn A. Waran

It is hereby ORDERED that the deadline for the parties to submit the joint letter outlined in the Court's October 7, 2020 Order (Dkt. 50) is hereby adjourned to November 23, 2020. This case was referred to Judge Robert W. Lehrburger for general pretrial purposes, which includes scheduling, discovery, non-dispositive pretrial motions, and settlement. (Dkt. 10.) Accordingly, any requests for extensions of the other deadlines in this case, including the deadline to report for mediation (Dkt. 46), should be directed to Judge Lehrburger.

SO ORDERED.

Date: October 26, 2020
New York, New York



JOHN P. CRONAN
United States District Judge